

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Marcus A. Little	:	Chapter 13
Shanyel M. Little	:	No.: 21-10824-MDC
Debtor(s)	:	

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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY MIDFIRST BANK.

Debtor, Edward V. Weis, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Midfirst Bank hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed. Debtors aver they had mismanaged payments and as they were not receiving statements, and further aver they had lost track of the total due.
7. Debtors opposes the same.
8. Debtor asks for the chance to cure the total arrears through an Amended Chapter 13 Plan.
9. Denied. Debtor asks for the chance to catch up.
10. No opposition to Movant's offer of any mortgage assistance programs nor to their communication with the Debtors not limited to the offer of any mortgage assistance program but to also permit Debtors to receive monthly statements and communicate with Movant with any and all matters regarding their account.
11. No response required.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: July 28, 2021

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
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Philadelphia, PA 19107  
(215) 545-0008

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CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**William C. Miller, Esq.**  
Chapter 13 Trustee

**Rebecca A. Solarz**  
Attorney for Movant  
Electronic Notice to *bkgroup@kmlawgroup.com*

Dated: July 28, 2021

/s/Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.  
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